



Advocates for Workplace Fairness

December 5, 2023

Via CM/ECF

The Honorable Ronnie Abrams
United States District Court
Southern District of New York
40 Foley Square, Room 2203
New York, NY 10007

Re: *Apolonia Reyes De Paulino, et al. v. Extended At Home Care, Inc.*
Case No. 23-CV-4199 (RA)

Dear Judge Abrams:

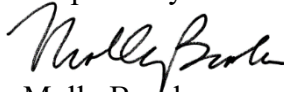
Along with co-counsel, we represent Plaintiff Apolonia Reyes De Paulino and Opt-in Plaintiff Elsa Alvarez Cabrera in the above-referenced matter. We write pursuant to the Court's Individual Practice Rule I(D) to request an extension of the deadline to move for default judgment as set by the Court's October 24, 2023 Order. *See* ECF No. 21.

The Court's Order requires Plaintiff to move for default judgment by December 7, 2023. Plaintiff's counsel recently became aware that Defendant does business using different names and intends to move to amend the complaint by December 7, 2023 to include those names. In amending the complaint, Plaintiff will amend the caption to list the correct entities and update the paragraphs regarding Defendant. While Plaintiff served the complaint on the correct address, some of the names Defendant appears to use were not listed. Ex. A (Working at Extended Homecare); Ex. B (Extended At Home Care in New York); Ex. C (DOS – Extended Holding Company, LLC); Ex. D (NYS DOH – Extended Home Care); Ex. E (DOS – Extended At Home Care). We believe that amending the complaint before moving for default will ensure the correct entities are included in the caption..

If necessary, Plaintiff will move for default judgment two weeks after the Clerk enters a Certificate of Default against the newly listed entities. This is Plaintiff's second request for an extension of this deadline. Since Defendant has not appeared in this case, Plaintiff's counsel is unable to seek Defendant's consent to extend this deadline.

Accordingly, Plaintiff requests that the the December 7, 2023 deadline to move for default judgment be adjourned to two weeks after the Clerk enters a Certificate of Default against the newly listed entities.

Respectfully submitted,


Molly Brooks

Application granted.

C: All Counsel of Record (via ECF)

SO ORDERED.



Hon. Ronnie Abrams
December 7, 2023